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January 18, 2019

VIA ECF

Hon. Freda L. Wolfson, U.S.D.J.
Clarkson S. Fisher Bldg. and
U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: Discover Bank v. Greenwood House Home for the Jewish
Aged t/a Abrams Residence, et al.
Civil Action No. 180-cv-16020(FLW)(TJB)**

Dear Judge Wolfson:

We represent Greenwood House Home for the Jewish Aged, t/a Abrams Residence ("Greenwood House"), one of the defendants in the above-referenced matter. Counsel for plaintiff provided us with defendant, Leslie Shayne's latest request to adjourn the return date of the Order to Show Cause. We have not been provided with the proposed order or rule to show cause referenced by Mr. Shayne in his letter.

As your Honor will recall, the Order to Show Cause was originally returnable on December 19, 2018, but was adjourned to January 24, 2019, at Mr. Shayne's request. Mr. Shayne now seeks to adjourn the return date based upon the fact that his dog injured his leg. Continuous adjournment requests are Mr. Shayne's *modus operandi*

Although perhaps novel, his sick dog argument is not sufficient, as Mr. Shayne can board his dog, Produce, with his vet or whoever else cared for Produce when Mr. Shayne previously traveled to New Jersey for court appearances. Based upon our experience with Mr. Shayne, he will continue to ask for adjournments until they are denied and then will use the denial to claim bias.

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For these reasons, Mr. Shayne's adjournment request should be denied.

Respectfully yours,

s/ R. James Kravitz

R. James Kravitz

RJK:bc

cc. David G. Murphy (via email and regular mail)
Lawrence F. Gilman (via email and regular mail)
Leslie J. Shayne (via email, regular mail and certified mail RRR)